

EXHIBIT B

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

TREVOR KEVIN BAYLIS,

Plaintiff,

v.

VALVE CORPORATION,

Defendant.

No. 2:23-cv-01653-RSM

**DEFENDANT VALVE
CORPORATION'S RESPONSES
TO PLAINTIFF TREVOR
KEVIN BAYLIS'S REQUESTS
FOR ADMISSION SET 2**

Defendant Valve Corporation ("Valve"), by and through its counsel of record, provides the following objections and answers to Plaintiff Trevor Kevin Baylis's Request for Admissions Set 2.

REQUEST FOR ADMISSION NUMBER 1.

1. Admit that in the case at hand, "Baylis v Valve Corporation", Valve cannot present any written and signed license or any other written and signed agreement from Plaintiff "Baylis", either directly or through any Chain of Title documentation that allows Valve to, store, display, distribute, sell, adapt, license or sub-license any of Baylis' copyrighted works, or works that he has a joint copyright interest to, such as the film Iron Sky including his 3D animated sequences and 3D models, including adapted models, associated with the film Iron Sky, via any means including but not limited to by Internet transmission, Sale, Streaming or any other Public Performance.

1 **ANSWER:** Objection. This Request calls for a legal conclusion.

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3 **REQUEST FOR ADMISSION NUMBER 2.**

4 2. Valve admit that the film Iron Sky is a “Berne Convention work” that was first
5 published by consent of all authors to a paying public on 11th February 2012 at the Berlin
6 Film Festival in Berlin, Germany.

7 **ANSWER:** Objection. This Request calls for a legal conclusion.

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9 **REQUEST FOR ADMISSION NUMBER 3.**

10 3. Valve admit that the “Country of Origin” for the film Iron Sky is Germany
11 under Berne Convention article 5 (4) (a).

12 **ANSWER:** Objection. This Request calls for a legal conclusion.

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14 **REQUEST FOR ADMISSION NUMBER 4.**

15 4. Valve admit that under the Berne Convention Article 5 (2) there is a “no
16 formalities” rule for the enjoyment and exercise of Baylis’ copyrighted works and therefore,
17 Baylis does not need a “court order” or any other formality to seek to protect his copyrighted
18 works in any country that is a signatory of the Berne Convention.

19 **ANSWER:** Objection. This Request calls for a legal conclusion.

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21 **REQUEST FOR ADMISSION NUMBER 5.**

22 5. Valve admit that under the Berne Convention Article 6bis Baylis has the right
23 to claim authorship of his works even in the event of a transfer of economic rights.

24 **ANSWER:** Objection. This Request calls for a legal conclusion.

1 **REQUEST FOR ADMISSION NUMBER 7 [sic].**

2 7. Valve admit that under the Berne Convention Article 15 (1) Baylis is protected
3 by the Berne Convention due to the fact his name appears on the work, the film Iron Sky, as
4 well as in meta data of numerous original 3D files from which the film Iron Sky is derived
5 from, and he can institute infringement proceedings to protect his work related to Iron Sky in
6 all Berne Union nations.

7 **ANSWER:** Objection. This Request calls for a legal conclusion.

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9 DATED: March 14, 2024.

ARETE LAW GROUP PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused true and correct copies of the foregoing document to be served upon the following, at the addresses stated below, via the method of service indicated.

Trevor Kevin Baylis (*pro se*)
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E-mail
U.S. Mail
E-filing

Dated this 14th day of March, 2024 in Seattle, Washington.

/s/ Janet C. Fischer
Janet C. Fischer
Paralegal